

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

STANADYNE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10207 (TMH)

(Jointly Administered)

Hearing Date: September 26, 2023 at 1:00 p.m. (ET)

Obj. Deadline: September 22, 2023 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR AN ORDER (I) APPROVING ON AN INTERIM BASIS THE
ADEQUACY OF DISCLOSURES IN THE COMBINED DISCLOSURE STATEMENT
AND PLAN OF LIQUIDATION, (II) SCHEDULING THE CONFIRMATION
HEARING AND DEADLINE FOR FILING OBJECTIONS, (III) ESTABLISHING
PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO
ACCEPT OR REJECT THE COMBINED PLAN AND DISCLOSURE STATEMENT,
AND APPROVING THE FORM OF BALLOT AND SOLICITATION PACKAGE,
AND (IV) APPROVING THE NOTICE PROVISIONS**

PLEASE TAKE NOTICE on September 8, 2023, the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy cases (the “Committee”) filed the *Motion of the Official Committee of Unsecured Creditors for an Order (I) Approving on an Interim Basis the Adequacy of Disclosures in the Combined Disclosure Statement and Plan of Liquidation, (II) Scheduling the Confirmation Hearing and Deadline for Filing Objections, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, and Approving the Form of Ballot and Solicitation Package, and (IV) Approving the Notice Provisions* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be filed and received before **September 22, 2023, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response on the following parties:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

Counsel to the Debtors	The United States Trustee
<p>Hughes Hubbard & Reed LLP One Battery Park Plaza, 16th Floor New York, NY 10004 Attn: Kathryn A. Coleman and Christopher Gartman, katie.coleman@hugheshubbard.com, chris.gartman@hugheshubbard.com</p> <p>Young Conaway Stargatt & Taylor, LLP 1000 North King Street Rodney Square Wilmington, DE 19801-6108 Attn: Michael R. Nestor and Andrew L. Magaziner mnestor@ycst.com, amagaziner@ycst.com</p>	<p>Office of the United States Trustee for the District of Delaware 844 King Street, Suite 2207, Lockbox 35 Wilmington, DE 19801 Attn: Jane M. Leamy jane.m.leafy@usdoj.gov</p>
Counsel to the Committee	Counsel to the Prepetition Agent and Stalking Horse Bidder
<p>Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036 Attn: Adam C. Rogoff and Rose Hill Bagley arogoff@kramerlevin.com, rbagley@kramerlevin.com</p> <p>Morris James LLP 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801 Attn: Jeffrey R. Waxman and Eric J. Monzo jwaxman@morrisjames.com, emonzo@morrisjames.com</p>	<p>KTBS Law LLP 1801 Century Park East, 26th Floor Los Angeles, CA 90067 Attn: Michael L. Tuchin and David A. Fidler mtuchin@ktbslaw.com, dfidler@ktbslaw.com</p> <p>Pachulski Stang Ziehl & Jones LLP 919 Market St., 17th Floor P.O. Box 8705 Wilmington, DE 19801-8705 (Courier 19801) Attn: Laura Davis Jones and Timothy Cairns ljones@pszjlaw.com, tcairns@pszjlaw.com</p>

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON SEPTEMBER 26, 2023, AT 1:00 P.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, THIRD FLOOR, COURTROOM 7, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND OR OBJECT IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: September 8, 2023

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

Jeffrey R. Waxman (DE Bar No. 4159)

Eric J. Monzo (DE Bar No. 5214)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: jwaxman@morrisjames.com

E-mail: emonzo@morrisjames.com

and

KRAMER LEVIN NAFTALIS & FRANKEL LLP

Thomas Moers Mayer (admitted *pro hac vice*)

Adam C. Rogoff (admitted *pro hac vice*)

Rose Hill Bagley (admitted *pro hac vice*)

1177 Avenue of the Americas

New York, NY 10036

Telephone: (212) 715-9100

E-mail: tmayer@kramerlevin.com

E-mail: arogoff@kramerlevin.com

E-mail: rbagley@kramerlevin.com

*Counsel to the Official Committee of
Unsecured Creditors*